

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEROME K. HAMILTON, a/k/a
ELOHIM CHEIKH AHMED,

Plaintiff,

v.

CATHY L. GUESSFORD, REBECCA
MCBRIDE, ROBERT F. SNYDER, THOMAS
L. CARROLL, and STANLEY W. TAYLOR,
JR.

Defendants

NOTICE OF 30(b)(6) DEPOSITION DUCES TECUM*

TO: Eileen Kelly, Esquire
Department of Justice
820 N. French Street, 6th Floor
Wilmington, DE 19801

PLEASE TAKE NOTICE, that pursuant to Rule 30(b)(6), Federal Rules of Civil Procedure, the defendants are to designate the person most knowledgeable with how medical records are recorded, maintained, and stored for prisoners, including the plaintiff, and with reference to records created by Prison Health Services, Inc. for a deposition on Wednesday, April 25, 2007 at 1:00 p.m. in the offices of Aber, Goldlust, Baker & Over, 702 King Street, Suite 600, Wilmington, DE 19801.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber

GARY W. ABER (DSB #754)
702 King Street, Suite 600
P.O. Box 1675
Wilmington, DE 19899
302-472-4900
Attorney for Plaintiff

DATED: April 20, 2007

***The deponent is to produce all medical records of the plaintiff from January 1, 1999 to the present, including all records created and/or generated by Prison Health Services, Inc.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the attached pleading was filed via electronic filing on April 20, 2007 and was served on the following counsel:

Eileen Kelly, Esquire
Department of Justice
820 N. French Street, 6th Floor
Wilmington, DE 19801

/s/ Melissa A. Chionchio
Melissa A. Chionchio
Secretary to Gary W. Aber, Esquire